

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**IN THE MATTER OF THE PETITION \***

**Of \***

**GRACE OCEAN PRIVATE LIMITED, \*  
As Owner of the M/V DALI,**

**and \***

**SYNERGY MARINE PTE LTD, \*  
As Manager of the M/V DALI,**

**For Exoneration from or Limitation of \*  
Liability**

**Civil Action No. 1:24-cv-00941-JKB**

**IN ADMIRALTY**

\* \* \* \* \*

**MOTION TO WITHDRAW APPEARANCE**

Pursuant to Local Rule 101(2)(b) of the United States District Court for the District of Maryland, Aaron J. Turner, Esquire and Levin Gann PA (collectively, “Levin Gann”), counsel for Claimant, Wisconsin Spice, Inc., hereby move to withdraw their appearance, and in support, state as follows:

1. Levin Gann seeks to withdraw their appearance in this matter as Levin Gann discovered a conflict of interest shortly after entering its appearance.
2. On September 26, 2024, Levin Gann advised Claimant’s *pro hac vice* counsel, Shanshan Liang, Esquire, of the conflict and referred Claimant to substitute local counsel.
3. Claimant has had ample time to engage substitute local counsel, but to date has not done so.

4. Accordingly, on October 28, 2024, more than a month after Claimant was advised of the conflict of interest, Levin Gann submitted a written notice to Claimant's *pro hac vice* counsel, Shanshan Liang, Esquire, as well as Claimant's counsel in Wisconsin, Anthony Resimius, Esquire. **Exhibit 1**, Local Rule 101(2)(b) Certificate at ¶ 5; *see also* LOCAL RULE 101(2)(b). Levin Gann advised Claimant that it should have another attorney enter his or her appearance or inform the Clerk of the Court that it does not intend to engage local counsel.

5. Claimant's and Ms. Liang's last known addresses are as follows:

Wisconsin Spice, Inc.  
478 S. Industrial Park Road  
Berlin, WI 54923

Shanshan Liang, Esquire  
Liang Mooney, PLLC  
2104 Delta Way, Unit 1  
Tallahassee, FL 32303

5. Levin Gann should be permitted to withdrawal its appearance as it has a conflict of interest in this matter and Claimant has had ample opportunity to engage local substitute counsel.

**WHEREFORE**, Aaron J. Turner, Esquire and Levin & Gann, P.A. request that this Honorable Court grant this Motion to Withdraw Appearance and grant such other and further relief as the Court deems appropriate.

Respectfully submitted,

\_\_\_\_\_  
/s/  
Aaron J. Turner  
Federal Bar No: 29822  
Levin Gann PA  
1 West Pennsylvania Avenue, Suite 900  
Towson, Maryland 21204  
Phone: (410) 321-0600  
Fax: (410) 339-5762  
[aturner@levingann.com](mailto:aturner@levingann.com)  
Attorney for Claimant

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of November 2024, a copy of the **Motion to Withdraw Appearance** and proposed **Order** were filed with the Clerk of Court using the CM/ECF system, which will send notification to all counsel who are CM/ECF participants.

\_\_\_\_\_/s/  
Aaron J. Turner